

## EXHIBIT B



San Francisco International Airport

September 14, 2021

Andre Guibert  
3523 Scott Street  
San Francisco, CA 94123

Re: Airport ID Badge Notice of Revocation

Dear Mr. Guibert,

By this letter, we notify you that the San Francisco International Airport (the Airport) has revoked your Airport ID badge on a permanent basis due to serious security violations under Airport Rules and Regulations as described below.

On September 9, 2021, at approximately 0445Hrs, the Airport received an alarm at Turnstile 710-1-TS01. Based on our review of security records for that location, we have determined that you presented your badge at the access control reader to gain access. We further observed you receiving another individual's badge through the turnstile and presented it on the proximity reader, then handed it back to that individual through the turnstile to gain access.

During this one event, you committed multiple aviation security violations and actively compromised the security of the Airport (see Airport Rules and Regulations, Rule 7). By circumventing the security turnstile at a direct access point into a Restricted Area, you violated Rule 7.7 Prohibitions. The prohibitions include tampering, interfering with, compromising, or attempting to circumvent any security system, measure, or procedure and entering a Restricted Area without complying with the systems, measures, or procedures intended to control access. Additionally, by receiving and using another person's Airport ID badge, you violated Rule 7.3(A) ["An individual employee's Airport ID badge may not be given to another, or used by another, to work and/or gain entry to a Restricted Area."].

The Airport computer-based training for attainment of an Airport ID badge includes training on the affirmative responsibilities for badge holders. The Airport has also provided periodic communications to badge holders to remind them of their responsibilities. We confirmed that the emails attached were sent to Alaska Airlines Authorized Signatories who had a responsibility to brief this information to all employees. In addition, a transcript of a mass notification was sent out to all Airport ID badge holders via either email or text message to the contact information we have on file associated with your ID Badge Profile. Copies of this messaging is attached for your reference. In addition, signage is posted directly at the Access Control point which states, "If you are unable to gain access after presenting your badge, please call the Security Operations Center at (650) 821-3915." A photo of that signage is also attached for your reference.

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

LONDON N. BREED  
MAYOR

LARRY MAZZOLA  
PRESIDENT

ELEANOR JOHNS  
VICE PRESIDENT

EVERETT A. HEWLETT, JR.

JANE NATOLI

MALCOLM YEUNG

IVAR C. SATERO  
AIRPORT DIRECTOR



## San Francisco International Airport

Due to the seriousness of these multiple violations that compromised security, the Airport is permanently revoking your Airport ID badge. Airport Rules and Regulations 7.1 (D) provides that, "Any person who violates this Rule 7, compromises Airport security, or creates or engages or participates in any unsafe, unsecure, or hazardous condition or activity at the Airport may have his/her access privileges immediately revoked on a temporary or permanent basis at the sole discretion of the Airport."

This decision may be appealed by following the process as outlined in the Airport Rules and Regulations section 14.5(C).

Respectfully,

A handwritten signature in blue ink, appearing to be "R", is written over a horizontal line.

*Aviation Security and Regulatory Compliance*

Attachments

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

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MALCOLM YEUNG

IVAR C. SATERO  
AIRPORT DIRECTOR

Wed 3/10/2021 9:05 AM

Dear Authorized Signatories,

The Airport's Access Control System is designed to prevent unauthorized access into Restricted Areas. The Airport has several layers of security, specifically at our Direct Access Points, to assist in preventing unauthorized access. We are continuing to see badge holders circumventing security measures if their badge is not working at a Direct Access Point card reader – particularly at Turnstiles. It is critical that you ensure your employees are briefed that if their badge does not work at a card reader – for any reason – they must either try a different access point or contact the Airport's Security Operations Center (SOC) for assistance. Any other actions taken to gain access will be deemed circumvention of security measures, and will result in enforcement action, up to and including the possibility of Airport ID badge revocation. The SOC is open 24/7 and can be reached at (650) 821-3915.

Thank you for your support.

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Start: Jul 27, 2021 13:15:41 PDT

General:

**IMPORTANT SECURITY REMINDER**

If you are unable to gain access at a Direct Access Point reader by properly using your Airport ID badge – for any reason – you **MUST** either try a different access point or contact the Airport's Security Operations Center (SOC) for assistance at 650-821-3915. Any other actions taken to gain access will result in enforcement action, up to and including the possibility of Airport ID badge revocation.



## AOA

### AUTHORIZED PERSONNEL ONLY NO TAILGATING

Employees Entering the AOA are Subject to Inspection  
Employees NOT traveling on aircraft may bring liquids, gels, and/or aerosols through access points OTHER THAN the passenger screening checkpoint  
**All individuals traveling as passengers MUST be screened by TSA prior to travel**

SFO  
San Francisco  
International  
Airport

If alarm is activated, call  
SOC Security Operation Center  
(650) 821-3915 and remain at door.

### ATTENTION

#### NO T-BADGE ACCESS

T-Badge with Escort Must Only use TSA Security or  
Vehicle Checkpoints for Access into the Sterile Secure Area

SFO  
San Francisco  
International  
Airport

For any questions please contact:  
SOC Security Operation Center  
(650) 821-3915  
sfoconnect.com/badging-security  
Violators will be subject to loss of privileges and fines/citations.

#### Direct Access Point

All persons and property  
(including vehicles) are  
subject to search beyond  
this point.

Transportation  
Security  
Administration

### ATTENTION

IF YOU ARE UNABLE TO GAIN ACCESS  
AFTER PRESENTING YOUR BADGE,  
PLEASE CALL  
THE SECURITY OPERATIONS CENTER (SOC)  
(650) 821-3915

4/11/18

## Effective

Aviation Security Will Be  
Restricting Access To  
Turnstile 710-1-TS01  
Access Will Only Be Allowed  
For Operational Purposes

710-1-TS01





San Francisco International Airport

**SIDA Badge Suspension Pending Review by the Airport Security Coordinator (ASC)**

Your badge has been suspended due to a violation of Airport Rules and Regulations. Due to the seriousness of this violation, this suspension is pending review by the ASC to determine the appropriate length of suspension up to and including permanent revocation.

While your badge is suspended pending review by the ASC, you are prohibited from working at the Airport, even on a T Badge/under escort and or in public areas of the Airport.

You will be contacted by the Aviation Security and Regulatory Compliance Office when a determination on your badge status has been made.

Aviation Security and Regulatory Compliance  
(650) 821-3900 – Office

City and County of San Francisco

Airport Commission Rules and Regulations

**RULE 7.0****AIRPORT SECURITY****7.1 GENERAL PROVISIONS**

- (A) **Priority.** Safety and security are the Airport's first priorities. The requirements of this Rule 7 are critical to the safe and secure operation of the Airport. All personnel working and doing business on Airport property must comply with this Rule at all times and model the significance of safety and security for co-workers, passengers, and members of the public.
- (B) **Definition of Restricted Area.** For the purpose of this Rule 7 only, any areas identified as Secured, Sterile, Restricted, or Air Operations Area (AOA), whether within a building or terminal or on the ramp or airfield area, shall be referred to collectively as the "Restricted Area." Additionally, any cargo buildings with direct access to the AOA or SIDA shall be referred to as a "Restricted Area."
- (C) **Airport Security Program.** This Rule 7 includes the non-Sensitive Security Information (SSI) requirements set forth in the Airport Security Program (ASP) issued by the Director under 49 C.F.R. 1542.
- (D) **Enforcement.** Any person who violates this Rule 7, compromises Airport security, or creates or engages or participates in any unsafe, unsecure, or hazardous condition or activity at the Airport may have his/her access privileges immediately revoked on a temporary or permanent basis at the sole discretion of the Airport (see also Rule 7.3 and Rule 14.4). Any person or entity responsible in whole or in part for any security violation shall also be responsible for any resulting cost, including but not limited to any fine imposed by a regulatory agency or remediation of property damage or personal injury.

**7.2 SECURITY BADGES**

Any person who works or does business in a Restricted Area or in the pre-security areas of Terminal Buildings on a permanent or temporary basis must hold a security badge issued by the Airport. Any person holding an Airport-issued security badge does so as a privilege and not a right.

The Airport shall issue a security badge to an individual only upon the request of a designated authorized signatory of an Airport tenant or contractor (an "Authorized Signatory") responsible for verifying that such individual is employed or authorized to perform duties or services on Airport property on behalf of the Airport tenant or contractor. The employer or sponsor of the Authorized Signatory and/or Airport ID badge holder shall remain responsible for the badge holder's compliance with these Rules and Regulations.

The Airport issues three types of security badges: (A) the Airport ID badge; (B) the Temporary or "T" badge; and (C) the Museum or "M" badge.

**(A) Airport ID Badge**

Persons who work or do business in a Restricted Area or in the pre-security areas of Terminal Buildings on a permanent or long-term (longer than 30 days) basis must have an Airport-issued identification in the form of an Airport ID badge. An individual holding an Airport ID badge may also be referred to as "badged personnel."



- (1) **Attainment:** An applicant for an Airport ID badge must pass all required Airport training course(s). Cheating, use of any electronic device during any training course, or failure to follow the proctor's directions regarding note taking shall result in the immediate and permanent rejection of the badge application or revocation of an existing badge (for badge holders renewing a badge).
- (2) **Expiration:** The Airport ID badge is issued for a maximum of two (2) years, and must be renewed prior to expiration.
- (3) **Return:** Upon a change in an individual Airport ID badge holder's employment status, the sponsoring employer is responsible for (a) immediately requesting Airport deactivation of the Airport ID badge and (b) returning the Airport ID badge. Failure to return an Airport ID badge will result in a lost badge fee and any applicable fines in accordance with Rule 14, which shall be charged to the employer. For employees on long-term leave (more than 30 days), employers must comply with Rule 7.3(H) below.

An individual badge holder must return his/her Airport ID badge to the sponsoring employer within three business days of a change in employment status. Failure to do so will render that individual ineligible for a period of two years of the employment termination or separation date. An Airport ID badge applicant may cure such ineligibility by returning the previously-issued badge to the Airport Security Access Office prior to the badge expiration date.

(B) **"T" Badge**

Persons who work or do business on in a Restricted Area on a temporary basis (30 days or fewer) must have an Airport-issued Temporary or "T" badge.

- (1) **Attainment:** An applicant for a "T" badge must submit to security vetting prior to obtaining access to any Restricted Area.

The "T" badge identifies an individual who is accessing the Restricted Area under escort (see subsection (3) below) for work or to conduct business and how frequently that person is accessing the Restricted Area. "T" badges may not be used to escort individuals for non-business purposes (such as family members, children, and friends) without prior approval from an Airport Security Coordinator (ASC).

There are two types of "T" badges: (a) Standard and (b) Limited Duration.

(a) Standard "T" badges are valid for a minimum of 24 hours and a maximum of 30 days.

(b) Limited Duration "T" badges are valid for less than 24 hours and must be returned no later than 24 hours from the time of issuance.

- (2) **Frequency/Duration:** The Airport will issue any one individual a "T" badge on not more than four (4) occasions within the previous 12-months from any request. Any request for an exception to this limit will be reviewed on a case-by-case basis by an ASC. Access that is provided under escort by an Airfield Safety Officer (ASO), Airport Duty Manager (ADM), or uniformed San Francisco Police Department-Airport Bureau (SFPD-AB) personnel does not require the use of a "T" badge and does not count toward the four occasions in the previous 12-month limit.

- (3) **Limited Access/Escort Required:** An individual holding a "T" badge may access a Restricted Area of the Airport only through a Passenger or Employee Security Screening Checkpoint, Vehicle Checkpoint, or a guarded exit lane if no Security Screening Checkpoint lanes accessing a terminal are staffed. Accessing Restricted Areas of the



Airport from a public area through a bypass door is strictly prohibited unless under escort of an ADM, ASO, TSA K-9 Handlers and Training Coordinators, or other AOA Badged Law Enforcement Officer with escort privileges .

At all times within the Restricted Area, an individual granted a "T" badge must be under escort by an Airport ID badge holder who has been granted escort authority as indicated by the word "ESCORT" on their Airport ID badge. A "T" badge holder under escort may also enter a Restricted Area through a Vehicle Checkpoint. An escort is not required for individuals with a valid "T" badge in pre-security areas of the Airport Terminals, the Fixed-Base Operator (FBO) Terminal, or other non-secure/non-sterile areas of Airport property including but not limited to airfield haul routes that have been deemed non-secure/non-sterile by the Airport Aviation Security & Regulatory Compliance Office (AVSEC).

Employees with escort authority may escort no more than eight individuals at one time unless approved by an ASC. The escort shall ensure that all persons under their escort remain in their line of sight and within voice control at all times. An escort may pass escort responsibility to another individual with escort authority, however the original escort must confirm the subsequent escort has escort authority by verifying that the word "ESCORT" appears on their badge.

NOTE: More details on the "T" badge program are available on the Airport's website at <https://sfoconnect.com/badging-security>.

**(C) "M" Badge**

The Museum or "M" badge is issued for the purpose of viewing SFO Museum Exhibits located in Sterile Areas. The Airport will issue "M" badges to individuals only upon security vetting. "M" badge holders are permitted unescorted access to Sterile Areas of the Airport for no longer than 24 hours. "M" badge holders may enter Sterile Areas only through Passenger Security Screening Checkpoints.

**7.3 AIRPORT ID BADGE HOLDER AND EMPLOYER SECURITY RESPONSIBILITIES / ACCESS CONTROL PROCEDURES**

All badged personnel have an affirmative duty to maintain a secure Airport. Airport tenants and contractors are responsible for ensuring that their employees, suppliers, contractors, subcontractors, and all other businesses and entities providing services on Airport property comply with Rule 7 of these Rules and Regulations.

Violation of the Airport access control procedures below may result in the assessment of fines under Rule 14, and/or fines under the terms of a lease and/or permit, and/or temporary or permanent revocation of an Airport ID badge at the sole discretion of the Airport (see Rule 7.1(D) and Rule 14.4). Administrative fines for violation of Rule 7 of these Rules and Regulations shall be payable to the Airport by the sponsoring tenant or contractor.

**(A) Badge Display and Use**

Personnel must display their Airport ID badge on the outermost garment, at or above the waist, at all times.

An individual employee's Airport ID badge may not be given to another, or used by another, to work and/or gain entry to a Restricted Area.

**(B) Security Screening**

Every person entering a Restricted Area is subject to security screening at any time.

When traveling for any purpose, an Airport ID badge holder (i) must present him/herself and his/her luggage/accessable property as a passenger; (ii) is prohibited from using her/her Airport ID badge to bypass Passenger Screening Checkpoints; and (iii) must remain in the Sterile Area after being screened. An Airport ID badge holder who exits a Sterile Area after being screened must be re-screened prior to traveling.

All persons entering a Restricted Area are subject to security screening at any time and must cooperate with any TSA or law enforcement search/pat down. Badged personnel are strictly prohibited from circumventing or avoiding security screening under any circumstance that security screening is required, such as at a vehicle checkpoint, for purposes of bringing prohibited items into a Restricted Area, when travelling, or when the TSA, Airport staff, Airport contractors, or law enforcement are conducting inspections.

Any badged individual who does not submit to a search/pat down in a Restricted Area is subject to citation, immediate suspension of his/her Airport ID badge, and removal from the Restricted Area. Unidentified or unauthorized personnel in the Restricted Area may be detained and/or removed by the Director or a duly-authorized representative. The Director or a duly-authorized representative may remove unidentified or unauthorized vehicles in the Restricted Area at the owner's expense.

**(C) Access to Restricted Area**

Airport ID badge holders and tenant/contractor employers must control access to the Restricted Area through careful use of any means of access, whether by door, vehicle checkpoint, or other.

Specifically, badged personnel and tenants/contractors must control access to any Restricted Area as follows:

- (1) Piggybacking/Tailgating:** An individual may not follow, or allow another to follow or access in any way through a card/biometric reader-operated door unless specifically authorized by the Airport. Any badged personnel who gains or allows another person unauthorized access into a Restricted Area by piggybacking or tailgating will be subject to the consequences as provided in Rule 14.
- (2) Keys and Locks:**
  - (a) Under no circumstance may an individual's Airport-issued security key be given to or used by another individual to gain entry through an Airport access-controlled door unless expressly authorized by the Airport.
  - (b) Tenant security doors leading from leased tenant space to a Restricted Area shall be keyed to either the Airport Master keying system, tenant's locking system, or cipher lock system.
  - (c) With respect to any cipher lock in the leasehold or control of any tenant, the tenant shall: ensure all cipher locks are properly maintained and operational at all times; conduct audits of cipher lock operability at least once per month; change cipher code locks in conformance with the Airport's schedule at least once per year; ensure that all access points providing direct access to Restricted Areas are closed and secured when not in use; immediately report to the Airport's Security Operations Center any cipher lock that is not functioning properly or any cipher lock code change.
- (3) Secure Doors and Gates:**
  - (a) Badged personnel must ensure security access doors and gates are closed and secured after entry, and without allowing another person to follow.



- (b) Security doors and gates shall be kept locked as required by the Airport Security Program.
- (c) Tenants shall be responsible for securing doors and gates located in their leased areas.
- (d) Before leaving the vicinity of an open Baggage Belt Roll Door, the attending badged personnel shall take deliberate action to ensure the door is properly closed and secured. Under no circumstance should the attending individual leave the immediate vicinity of the Baggage Belt Roll Door until it is properly closed and secured.
- (4) **Report False Alarm:** Badged personnel are required to immediately report any self-activation of a door alarm to the Security Operations Center at (650) 821-3915.
- (5) **Damage:** Under no circumstances may an individual engage in defacing, damaging, hacking, or interacting with any Airport Security System in any way that limits operation of such systems.
- (6) **Unauthorized Access:** Badged personnel must report any unauthorized person(s) in a Restricted Area and any potential security violations to the Airport's Communications Center by dialing 911.
- (7) **Access Point Malfunction:** If any facility on Airport property has an access point that is not functioning properly, such as a cargo facility roll up door, a pedestrian door secured by the access control system, or any other type of access point that, if unsecured, would allow for unauthorized access, the tenant or contractor must promptly take the following actions (ASB 20-07):
  - Notify the Security Operations Center (SOC) immediately at (650) 821-3915.
  - If a temporary barricade will be used until the access point can be restored to normal operation, the temporary barricade must be inspected and approved by the SOC.
  - A guard with Airport ID Badge must be posted 24/7 at the location to prevent unauthorized access until the situation is resolved and the SOC approves reassignment of the guard.
  - Every repair or adjustment must be inspected and approved by the SOC.

**(D) Restricted Area Duty to Challenge**

Badged personnel must conscientiously observe the presence of an Airport ID badge on other employees. Every Airport ID badge holder must ensure the following:

- (1) Badge is valid for area of use;
- (2) Badge has not expired;
- (3) Photograph on badge matches person holding badge; and
- (4) As to any individual who fails to produce an Airport ID badge, appears suspicious, or is not under proper escort, badged personnel shall provide a detailed description to the Airport Communication Center by dialing 911. While badged personnel should not attempt to physically restrain the individual, they must make every effort to keep such individual under visual observation until security/law enforcement personnel arrive.

**(E) Drug and Alcohol Prohibition**

- (1) **Prohibited Substances:** No Airport ID badge holder may transport into the Restricted Area any alcohol or any drug identified by the United States Drug Enforcement Agency (DEA) as a "Schedule I" drug, nor may any individual with an Airport ID badge ingest alcohol or a Schedule I drug eight or fewer hours before work or while at work, including breaks. Schedule I drugs are: heroin, LSD, marijuana, ecstasy, methaqualone, and peyote. See <https://www.dea.gov/druginfo/ds.shtml>.
- (2) **Prescription Drugs:** No Airport ID badge holder may transport into any Restricted Area any of the following substances unless the individual has a prescription: Any drug identified by the DEA as a Schedule II, III, IV, or V drug. Individuals with a current prescription for Schedule II-V drugs must have in their possession the medication in the original prescription bottle, with a legible label showing the name of the individual.
- (3) **Working under the Influence:** No Airport ID badge holder may enter or remain in a Restricted Area if the individual is in any way impaired as a result of ingesting substances referenced in this Rule 7.3, including prescription drugs.

**(F) Use of Armed Guards, Armored Vehicles, Armed Courier Services**

Tenants or contractors using armed guards and/or armored courier services to, for example, transport currency or high value items or to service automated teller machines, must assure that that its service provider comply as follows:

- (1) **Badge Required:** All armed security guards/couriers accessing any area of the Airport – public (non-Restricted) or Restricted – must be in uniform and in possession of an Airport ID badge or hold a "T" badge under proper escort.
- (2) **Vehicle access:** Armored vehicles entering a Restricted Area for the purpose of picking up or dropping off freight planeside shall enter only through a Vehicle Screening Checkpoint. All drivers must have a non-movement area driving icon displayed on their badge and must follow all non-movement area driving rules. Prior to accessing the Restricted Area, armed vehicle drivers must complete the Armored/Courier Vehicle Information Sheet form (and provide it to the Police Services Aide at the Vehicle Screening Checkpoint: <https://sfoconnect.com/sites/default/files/ASB%202017-20%20Armed%20Guards%20Armored%20Vehicles%20Courier%20Services%20at%20the%20Airport.pdf>). A point of contact with a mobile phone must be in the vehicle at all times while on the AOA.
- (3) **Parking:** All armored vehicles requiring access to any public (non-Restricted) or Restricted Areas of the Airport Terminal Buildings must park on the Arrivals Level only. For the International Terminal, vehicles must be parked on either end of the terminal roadway and in the Domestic Terminal, vehicles may be parked anywhere on the Arrivals Area curb. Drivers are prohibited from double parking and/or obstructing active passenger loading or offloading. Alternatively, drivers may park in courtyards.

**(G) Security Testing**

Prior to commencing with any internal testing, air carriers must notify the Airport Security Operations Center ("SOC") at (650) 821-3915. Notice must be given at least two (2) hours prior to the testing. The SOC must be advised of the date and time of the testing period, the location where the testing will take place, the type of test (badge challenge, tailgate, etc.), and when the testing has been completed.



**(H) Securing Badges of Individuals on Long Term Leave**

Every badged individual who goes on a leave of absence for 30 consecutive days or more shall surrender his/her/their Airport ID badge and keys to the individual's Authorized Signatory. This requirement applies to every type of leave, including but not limited to medical leave, workers' compensation leave, leave under the Family Medical Leave Act, military leave, jury duty, compensatory time off, and vacation.

- (1) Duty of Authorized Signatories:** Authorized signatories shall collect all Airport ID badges and keys before badged individuals commence extended leaves of absence. Airport ID badges and keys shall be returned to the Security Access Office ("SAO") within three calendar days of leave commencement. Authorized Signatories shall also submit an Employee Extended Leave form to the SAO, which is available on SFOConnect.
- (2) Leaves of Uncertain Duration:** Where a badged individual commences a leave of fewer than 30 consecutive calendar days and the leave is extended beyond 30 consecutive calendar days, the Authorized Signatory shall notify the SAO by the 30th day that a leave has been extended and shall complete the Badgholder Extended Leave form within three calendar days. The SAO shall immediately deactivate security access, and the Authorized Signatory shall return City property to the SAO within three calendar days of such notification.
- (3) Re-entry Following Extended Leave:** When an individual returns to work from an extended leave, the Authorized Signatory shall contact the SAO to reactivate the individual's Airport ID badge and advise when the individual will retrieve the badge and keys (if applicable). In the event a badge has expired while an individual is on leave, or in cases where the leave exceeds 180 days, the affected employee must successfully complete (a) a criminal history records check, (b) a security threat assessment administered by the Transportation Security Agency, and (c) the computer-based security access training administered by the SAO.

Every non-City employee who fails to surrender his/her/their Airport ID badge and keys upon request will be subject to immediate and permanent badge revocation.

**7.4 TRANSPORTING ITEMS INTO THE RESTRICTED AREA****(A) TSA Prohibited Items**

Except as provided under TSA Regulations and this Rule 7.4, no person may transport a Prohibited Item into the Restricted Area. "Prohibited Items" are defined under 49 CFR 1540.111 and more specifically in the TSA website: <https://www.tsa.gov/travel/security-screening/whatcanibring/all>.

TSA shall provide the proper materials collection system to ensure that all materials, including those prohibited are properly sorted and delivered to the designated Materials Recovery Area.

Any badged personnel who discovers or comes into possession of a Prohibited Item, loose ammunition, or other potentially dangerous item during the check-in process or from a passenger, must immediately contact SFPD-AB at (650) 876-2424 to have an officer respond for proper confiscation and/or disposal. Such items shall not be disposed of in a trash receptacle or hazmat container.

**(B) Procedures to Transport Prohibited Items into the Restricted Area**

All Airport ID badge holders, tenants, or contractors requiring Prohibited Items, including but not limited to knives, tools, and/or heavy equipment to perform their job duties or for their business operations in a Restricted Area are required to comply with the following procedures.

**(1) Food and Beverage Inventory Items:**

All Food and Beverage concessions shall follow these procedures when adding to or replacing their prohibited item inventories. The concessions manager shall contact Aviation Security (650-821-3915) to coordinate prohibited item access into the Restricted Area.

- (a) Aviation Security shall inspect the Prohibited Item(s) and then transport them to the Restricted Area business establishment. Prohibited Item(s) should be transported in a manner in which they are concealed from public view.
- (b) The concession tenant manager or designated representative shall proceed through the Passenger Screening Checkpoint, then meet the Aviation Security staff member at the business establishment to re-gain possession of the Prohibited Item(s).
- (c) The concession tenant manager or designated representative shall demonstrate to Aviation Security how Prohibited Items are secured during operational and non-operational hours.
- (d) All tenants and contractors shall be responsible for proper safeguarding and storage of Prohibited Items and tools during operational and non-operational hours.
- (e) Food and Beverage concessions may provide customers with only Airport-approved round-blade butter knives. Prior to providing a round-bladed metal butter knife for passenger use, the concession tenant must submit a letter requesting Airport approval of the implement with a sample round-bladed knife intended for use at its location. The request must be directed to the Airport's Aviation Security Department (AVSEC). Upon review, AVSEC will issue a written approval or rejection of the specific butter knife. Any subsequent proposed change by a concession tenant of its round-bladed butter knife shall be subject to the same approval process.
- (f) All concession tenants shall audit Prohibited Item inventories in conformance with the most current version of the Restricted Airport Security Bulletin (ASB) titled "Sterile Area Prohibited Items Requirements." Those with a need to know may obtain a copy of this Restricted ASB from AVSEC.

**(2) Inspection of Merchandise and Consumables:**

The following applies only to merchandise or consumables intended for a Sterile Area (passenger terminals):

Any merchandise or consumables intended for sale, consumption, and/or use in a Restricted Area – whether to be purchased or obtained from a concession tenant, an airline club or lounge, or at a special event – must be inspected by Airport-specified contract security personnel or by TSA at an employee or passenger screening checkpoint. Using employee bypass doors to transport merchandise or consumables into a Restricted Area is prohibited.



Inspections shall confirm that no commercially packaged boxes, cartons, containers, racks, or packages show signs of tampering or altering and do not include any items that are prohibited under TSA regulations. Inspections may include the person and belongings of any personnel transporting merchandise or consumables into a Restricted Area.

Only Airport ID badged personnel may transport merchandise or consumables into a Restricted Area and only through a screening checkpoint. An Airport ID badge holder may escort "T"-badged delivery personnel only if the Airport ID badge holder has escort authority.

Badged personnel shall cooperate with safety and security test inspections. Inspectors performing these tests may ask vendors to place prohibited items in their deliveries for testing purposes. Vendors shall comply with this request. Any badged individual who refuses to assist with ongoing security testing in Restricted Areas of the Airport may be subject to citation and suspension of his/her/their Airport ID badge.

**(3) Tools (Temporary Non-Inventory):**

- (a) Requester shall provide notification to the Airport Duty Manager (ADM) at (650) 821-5222. The ADM shall notify the TSA Coordination Center at (650) 266-1966 when the use of an exit lane is required. If the ADM is unavailable, an Airport Representative can assist.
- (b) Upon arrival at the Passenger Screening Checkpoint, the requester shall tender the tools to the ADM. The individual(s) shall then be processed (screened) through the security checkpoint. The ADM will inspect the tools to confirm they are work-related.
- (c) The ADM will then take the approved tools through a bypass door and meet the requester in the Restricted Area. If the prohibited item(s) is/are too heavy, the ADM will escort requesters and their approved tools into the Restricted Area through a by-pass door.
- (d) If the requester possesses a "T" badge, escort custody of this individual shall be transferred to a company sponsor and Airport ID badge holder with Escort privileges for continuation of proper escort.
- (e) The Airport ID badged personnel with "Escort" privileges shall ensure escort responsibility for their "T" badged workers' possession of tools at all times when in the Restricted Area.

**(4) Transport of Heavy/Oversized Prohibited Items:**

- (a) Requester shall provide notification to the Airport Duty Manager (ADM) at (650) 821-5222. The ADM shall notify the TSA Coordination Center at (650) 266-1966. If the ADM is unavailable, an Airport Representative will assist.
- (b) Only those heavy/oversized items necessary for a particular job are allowed into the Restricted Area and will be transported through a vehicle checkpoint, the passenger screening exit lane, or another secure access point escorted by authorized personnel.
- (c) Heavy/oversized items must be in some form of container, where possible.
- (d) If applicable, the requester will meet the ADM at the appropriate passenger security screening checkpoint exit lane.

- (e) At the exit lane, requesters shall tender their items to the TSA for inspection. Requesters shall then be processed through the checkpoint.
- (f) The tenant/contractor sponsor is responsible for providing the appropriate Airport security badge to the requester as required.
- (g) Except as permitted by the Airport, use of bypass doors to transport heavy or oversized prohibited items is strictly prohibited.

## **7.5 VIDEO MONITORING AND RECORDING DEVICES / ACCESS TO AIRPORT CLOSED CIRCUIT TELEVISION (CCTV) SYSTEM**

### **(A) Installation or Removal of Video Monitoring and Other Recording Devices**

No video monitoring or other recording devices may be installed or removed by any Airport tenant or contractor in or around the Airport premises without prior written authorization from the Aviation Security unit. To obtain authorization for CCTV camera installation or removal, tenants and contractors must submit an application, specifying the following:

- Field-of View (FOV) screenshots
- Video monitoring/recording device model and specifications
- Recording system and retention time
- Camera layout drawing
- Security infrastructure and plan to prevent unauthorized access

The use of Pan-Tilt-Zoom (PTZ) security cameras by tenants and contractors in any Restricted area is strictly prohibited and no video monitoring and/or recording device may be installed or focused in a manner that depicts/records security checkpoints, or doors that provide access to any area on Airport premises that, in the sole and exclusive discretion of the Director or his designee, is deemed to present a potential risk to Airport security. All subsequent changes or modifications to tenant and contractor video monitoring and/or recording device use must be submitted to Aviation Security in writing and approved prior to executing modifications.

### **(B) Remote Viewing and Authorization Access**

No video monitoring and/or recording device data may be streamed or otherwise transmitted on a wireless network unless the wireless network is equipped with WPA2 security. Real-time access to all footage must be available to the Aviation Security unit at all times. No tenant or contractor shall release any video monitoring and/or recording device footage from cameras/devices without prior written authorization from the Aviation Security unit and, if deemed appropriate, the TSA. Remote access to video monitoring and/or recording devices in secure areas will not be permitted unless explicitly authorized by the Director.

All forms of video footage, whether real-time or stored, must be password protected. Passwords must comply with the Airport's Password policy.

### **(C) Inventory of Video Monitoring and Other Recording Devices**

All tenants and contractors shall provide Aviation Security with an inventory of existing video monitoring and/or recording devices and security plans, including all of the following:

- Device manufacturer, model and specifications
- Field-of-view
- Data retention time
- Placement of video monitoring and/or recording devices
- Remote access usage



- Written security plan detailing how unauthorized access will be prevented

**(D) Airport Closed-Circuit Television (CCTV) Access Policy**

The Airport owns and operates the CCTV system. This system contains information that is confidential, which may be sensitive secure, affect personal privacy, or both. A tenant or contractor may access Airport CCTV feeds only through Airport equipment upon request to Airport Aviation Security (AVSEC). If access is granted, the tenant or contractor shall designate individual employees to view CCTV feeds for the performance of official job duties, on a need-to-know basis only. Any such individual must hold an Airport ID badge and execute a Non-Disclosure Acknowledgement as a condition of authorized access. (ASB 20-02, ASB 20-06)

**7.6 OTHER RESTRICTED AREAS**

- (A) Clear Zone.** The Director or a duly-authorized representative, at the owner's expense, may remove unidentified or unauthorized vehicles parked in posted "no parking" zones within 10' along the Restricted Area/AOA perimeter fence, which has been designated as the "Clear Zone". The "Clear Zone" shall remain free of vehicles, stored materials or unattended equipment. Stored materials or unattended equipment may also be removed and/or disposed of at the owner's expense.
- (B) Water Perimeter Zone.** Entry into the San Francisco International Airport Water Perimeter Security Zone (WPSZ) is prohibited. No person, vessel, or boat shall enter the WPSZ without the express permission of the United States Coast Guard Captain of the Port and Director or duly-authorized representative.
- (C) Utility Tunnels.** Entry into any Airport utility tunnel is prohibited unless the person accessing the tunnel holds an Airport ID badge or is holding a "T" badge under escort with an Airport ID badge holder with escort authority.
- (D) Roof Doors.** Access to any terminal building rooftop is restricted. Before accessing a rooftop, the individual must notify Airport Communications at (650) 876-2424. Additionally, the individual must either (1) be authorized by permission of Airport Aviation Security (AVSEC) (for doors with an access control reader) or (2) be escorted by a Duty Manager (for doors controlled by metal key). For AVSEC permission to use a roof door access control reader, the tenant/contractor must submit a completed request form (<https://sfoconnect.com/sites/default/files/legacy/access-level-request.pdf>), by electronic mail to SFOAVSEC@flysf.com.

**7.7 PROHIBITIONS**

No person or entity may:

- (A)** Tamper or interfere with, compromise, modify, or attempt to circumvent any security system, measure, or procedure implemented under the Airport's ASP and TSA Regulations under 49 C.F.R. § 1500, *et seq.*;
- (B)** Enter, or be present within, a Restricted Area without complying with the systems, measures, or procedures being applied to control access as defined in the Airport's ASP and TSA Regulations under 49 C.F.R. § 1500, *et seq.*; or
- (C)** Use or allow to be used any Airport-issued access medium or identification system that authorizes the access, presence, or movement of persons or vehicles in Restricted Area in any unauthorized manner.

City and County of San Francisco

Airport Commission Rules and Regulations

#### **7.8 QUALITY STANDARDS PROGRAM ("QSP")**

The Airport Commission adopted the Quality Standards Program ("QSP") to enhance safety and security at SFO. The purpose of the policy is to ensure that the service providers offer the highest level of quality service to the Airport community, and to enforce the minimum standards for safety, health, hiring, training, wages and benefits, and equipment standards for the airline service provider employees.

The QSP applies to any firm, including airline and third party vendor (collectively, "covered employer"), which employs personnel involved in performing services which directly impact safety and/or security at the Airport. Any covered employer must, as a condition to its operating on the Airport, comply with the QSP, as the same may be amended from time to time at the sole discretion of the Airport Commission.

All tenants are required to comply with all other Airport operating requirements, including those in their respective leases and permits, Airport Rules and Regulations, and Airport Directives.





San Francisco International Airport

September 14, 2021

Walter Spurlock  
1403 Marisol Dr  
Manteca, CA 95337

Re: Airport ID Badge Notice of Revocation

Dear Mr. Spurlock,

By this letter, we notify you that the San Francisco International Airport (the Airport) has permanently revoked your Airport ID badge due to serious security violations under Airport Rules and Regulations as described below.

On September 9<sup>th</sup>, 2021, at approximately 0445Hrs, the Airport received an alarm at Turnstile 710-1-TS01. Based on our review of security records for that location, we have determined that you presented your badge at the access control reader and failed to gain access. We further observed you reaching through the turnstile and handing your badge to another individual, who presented your badge on the proximity reader, then handed it back to you through the turnstile to gain access.

During this one event, you committed multiple aviation security violations and actively compromised the security of the Airport (see Airport Rules and Regulations, Rule 7.0). By circumventing the security turnstile at a direct access point into a Restricted Area, you violated Rule 7.7 Prohibitions. The prohibitions include tampering, interfering with, compromising, or attempting to circumvent any security system, measure, or procedure and entering a Restricted Area without complying with the systems, measures, or procedures intended to control access. Additionally, by allowing another person to use your Airport ID badge, you violated Rule 7.3(A) ["An individual employee's Airport ID badge may not be given to another, or used by another, to work and/or gain entry to a Restricted Area."].

The Airport computer-based training for attainment of an Airport ID badge includes training on the affirmative responsibilities for badge holders. The Airport has also provided periodic communications to badge holders to remind them of their responsibilities. We confirmed that the emails attached were sent to Alaska Airlines Authorized Signatories who had a responsibility to brief this information to all employees. In addition, a transcript of a mass notification was sent out to all Airport ID badge holders via either email or text message to the contact information we have on file associated with your ID Badge Profile. Copies of this messaging is attached for your reference.

In addition, signage is posted directly at the Access point which states, "If you are unable to gain access after presenting your badge, please call the Security Operations Center at (650) 821-3915."

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

LONDON N. BREED  
MAYOR

LARRY MAZZOLA  
PRESIDENT

ELEANOR JOHNS  
VICE PRESIDENT

EVERETT A. HEWLETT, JR.

JANE NATOLI

MALCOLM YEUNG

IVAR C. SATERO  
AIRPORT DIRECTOR

Post Office Box 8097 San Francisco, California 94128 Tel 650.821.5000 Fax 650.821.5005 www.flysfo.com

CCSF-SG\_000005



## San Francisco International Airport

Due to the seriousness of these multiple violations that compromised security, the Airport is permanently revoking your Airport ID badge. Airport Rules and Regulations 7.1 (D) provides that, "Any person who violates this Rule 7, compromises Airport security, or creates or engages or participates in any unsafe, unsecure, or hazardous condition or activity at the Airport may have his/her access privileges immediately revoked on a temporary or permanent basis at the sole discretion of the Airport."

This decision may be appealed by following the process as outlined in the Airport Rules and Regulations section 14.5(C).

Respectfully,

A handwritten signature in blue ink, consisting of a stylized 'M' followed by a long horizontal line.

*Aviation Security and Regulatory Compliance*

Attachments

**AIRPORT COMMISSION** CITY AND COUNTY OF SAN FRANCISCO

LONDON N. BREED  
MAYOR

LARRY MAZZOLA  
PRESIDENT

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VICE PRESIDENT

EVERETT A. HEWLETT, JR.

JANE NATOLI

MALCOLM YEUNG

IVAR C. SATERO  
AIRPORT DIRECTOR



Wed 3/10/2021 9:05 AM

Dear Authorized Signatories,

The Airport's Access Control System is designed to prevent unauthorized access into Restricted Areas. The Airport has several layers of security, specifically at our Direct Access Points, to assist in preventing unauthorized access. We are continuing to see badge holders circumventing security measures if their badge is not working at a Direct Access Point card reader – particularly at Turnstiles. It is critical that you ensure your employees are briefed that if their badge does not work at a card reader – for any reason – they must either try a different access point or contact the Airport's Security Operations Center (SOC) for assistance. Any other actions taken to gain access will be deemed circumvention of security measures, and will result in enforcement action, up to and including the possibility of Airport ID badge revocation. The SOC is open 24/7 and can be reached at (650) 821-3915.

Thank you for your support.

---

Start: Jul 27, 2021 13:15:41 PDT

General:

**IMPORTANT SECURITY REMINDER**

If you are unable to gain access at a Direct Access Point reader by properly using your Airport ID badge – for any reason – you **MUST** either try a different access point or contact the Airport's Security Operations Center (SOC) for assistance at 650-821-3915. Any other actions taken to gain access will result in enforcement action, up to and including the possibility of Airport ID badge revocation.



**AOA**  
**AUTHORIZED PERSONNEL ONLY**  
**NO TAILGATING**

Employees Entering the AOA are Subject to Inspection  
Employees NOT traveling on aircraft may bring liquids, gels, and/or aerosols through access points OTHER THAN the passenger screening checkpoint  
**All individuals traveling as passengers MUST be screened by TSA prior to travel**

If alarm is activated call SOC Security Operation Center (650) 821-3915 and remain at door.

**ATTENTION**  
**NO T-BADGE ACCESS**

T-Badge with Escort Must Only use TSA Security or Vehicle Checkpoints for Access into the Sterile/Secure Areas

For any questions please contact:  
SOC Security Operation Center  
(650) 821-3915  
sfoconnect.com/badging-security

Violators will be subject to loss of privileges and fines/revocations.

**Direct Access Point**

All persons and property (including vehicles) are subject to search beyond this point.

United is unable to verify accuracy of any information, you are responsible for ensuring accuracy under applicable law. © 2018 United Mileage Plus

**ATTENTION**  
IF YOU ARE UNABLE TO GAIN ACCESS  
AFTER PRESENTING YOUR BADGE,  
PLEASE CALL  
THE SECURITY OPERATIONS CENTER (SOC)  
(650) 821-3915

**Effective**  
**4/11/18**

Aviation Security Will Be  
Restricting Access To  
Turnstile 710-1-TS01  
Access Will Only Be Allowed  
For Operational Purposes

5/16/2018 C&G SP SF 04